

ROD M. FLIEGEL, Bar No. 168289
rfliegel@littler.com
ALISON S. HIGHTOWER, Bar No.
ahightower@littler.com 112429
AMANDA N. FU, Bar No. 254287
afu@littler.com
LITTLER MENDELSON, P.C.
650 California Street, 20th Floor
San Francisco, California 94108.2693
Telephone: 415.433.1940
Facsimile: 415.399.8490

Atorneys for Defendant
U.S. SECURITY ASSOCIATES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBERT STONE, on behalf of himself and
all others similarly situated,

Case No. 3:15-CV-00235-JST

Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER POSTPONING CASE
MANAGEMENT CONFERENCE**

U.S. SECURITY ASSOCIATES, INC., a
Delaware corporation, and Does 1 through 10,

Complaint Filed: January 16, 2015

Defendants.

1 **IT IS HEREBY STIPULATED AND REQUESTED** by and between the parties
 2 who have to date appeared in this action, through their counsel of record, Peter R. Dion-Kindem of
 3 The Dion-Kindem Law Firm; Lonnie C. Blanchard, III of The Blanchard Law Group, APC; and
 4 Jeffrey D. Holmes of Holmes Law Group, APC, attorneys for Plaintiff ROBERT STONE
 5 ("Plaintiff"); and Rod M. Fliegel, Alison S. Hightower and Amanda N. Fu of Littler Mendelson,
 6 P.C., attorneys for Defendant U.S. SECURITY ASSOCIATES, INC. ("Defendant"), based upon the
 7 following recitals:

8 **2.** WHEREAS Defendant filed a motion to transfer venue to the Northern District of
 9 Georgia originally set to be heard on April 9, 2015 (Doc. 17);

10 **3.** WHEREAS on March 26, 2015, this Court granted the parties' joint request to extend
 11 the parties' deadlines under Federal Rule of Civil Procedure Rule 26 and 26(f) pending resolution of
 12 the motion to transfer venue, assuming that motion is denied (Doc. 20);

13 **4.** WHEREAS on March 31, 2015, this Court vacated the April 9, 2015 hearing date on
 14 Defendant's pending motion to transfer venue (Doc. 22);

15 **5.** WHEREAS, the initial Case Management Conference in this action is currently set
 16 for April 29, 2015 and a Joint Case Management Statement is due to be filed on April 15, 2015;

17 **6.** WHEREAS, a transfer of venue likely will result in additional or different case
 18 management schedules and requirements, and thus a modest delay on these obligations will further
 19 efficient and effective case management and thus serve the interests of economy for the Court and all
 20 Parties;

STIPULATION

21 Pursuant to this Court's Standing Order and Civil Rule 16-2(e), so as to promote efficient and
 22 effective case management and thus serve the interests of economy for the Court and all Parties, the
 23 Parties hereby stipulate, agree and respectfully request:

24 **1.** That the Case Management Conference, currently set for April 29, 2015, is continued
 25 until _____, 2015, or ____ days after this Court's service of an order on
 26 Defendant's Motion To Transfer Venue, assuming that motion is denied;
 27
 28 ///

2. The current April 15, 2015 deadline for the parties to file their Joint Case Management Conference Statement is extended until 14 days prior to the new date for this Case Management Conference;

3. In the event the Court grants Defendant's pending Motion to Transfer Venue, these deadlines will be vacated and will be set by the transferee district.

IT IS SO STIPULATED.

Dated: April 13, 2015

/s/ Peter R. Dion-Kindem
PETER R. DION-KINDEM
THE DION-KINDEM LAW FIRM
Attorneys for Plaintiff
ROBERT STONE

Dated: April 13, 2015

/s/ Alison S. Hightower
ROD M. FLIEGEL
ALISON S. HIGHTOWER
LITTLER MENDELSON, P.C.
Attorneys for Defendant
U.S. SECURITY ASSOCIATES, INC.

ORDER

PURSUANT TO STIPULATION, THE COURT HEREBY ORDERS:

1. The Case Management Conference, currently set for April 29, 2015, is continued until June 24, 2015, or _____ days after this Court's service of an order on Defendant's Motion to Transfer Venue, assuming that motion is denied;

2. The current April 15, 2015 deadline for the parties to file their Joint Case Management Conference Statement is extended until 14 days prior to the new date for this Case Management Conference; and

3. In the event the Court grants Defendant's pending Motion to Transfer Venue, these deadlines will be vacated and will be set by the transferee district.

Dated: April 15, 2015

HON. JON S. TIGAR
U.S. DISTRICT COURT JUDGE

Firmwide: 132897030.1 067673.1049